



DATE: February 2001

TO: All Hartford Employees

SUBJECT: Reminder on Policy Against Discrimination and Harassment

Ramona Auer  
Chairman & Chief  
Executive Officer

At The Hartford, we believe it is important to treat all employees fairly. We also believe that fair treatment can occur only in a work environment that is free of discrimination and harassment. This position is taken not just because the law requires it, but also because we believe it makes good business sense. Our success in meeting company goals and objectives depends on the contribution of each individual. No person can contribute his or her best if it is their belief that they are being discriminated against or harassed.

The way we treat each other is so important that, every year, I send a memo to remind you about our corporate policies regarding a zero tolerance for any type of behavior which may be construed as discrimination or harassment. This memo will also provide you with the company's policy on the handling of discrimination and harassment complaints. Please abide by this policy.

Discrimination and harassment occur when people are treated differently because of their protected group status, which includes and is limited to their sex, race, color, religion, age, national origin, marital status, sexual orientation, ancestry, veteran status, disability, pregnancy and/or citizenship status. Discrimination and harassment are defined as follows:

Discrimination – unfair treatment of an employee or applicant in any aspect of employment based on their protected group status.

Harassment – unwelcome conduct, whether verbal, physical or visual, which is based on a person's protected group status. Harassing conduct may affect tangible benefits, interfere unreasonably with an individual's work performance, or create an intimidating, hostile or offensive working environment.

Sexual harassment warrants particular mention. Sexual harassment is defined as unwelcome behavior of a sexual nature that has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Examples of discrimination and harassment include but are not limited to:

- Suggestive comments, sexual jokes or jokes with references to protected group status, unwelcome touching or propositions.
- Direct or indirect threats that failure to submit to harassment or discrimination will negatively affect terms or conditions of employment.
- Displays of objects, pictures or posters in the workplace, including e-mails, calendars and screen savers, which are sexual or derogatory to those within a protected group status.

Discrimination or harassment of The Hartford's employees by anyone, including a supervisor, co-worker, vendor, client or customer, will not be tolerated.

Hartford Plaza  
Hartford, CT 06115  
860 547 5000

## Equal Opportunity Development Department

Role  
Confidentiality  
Reporting allegations  
For more information

### Role

The Equal Opportunity Development (EOD) Department services employees by:

- Investigating and addressing issues relating to workplace discrimination and harassment,
- Implementing and enforcing Hartford policies and practices relating to the prevention of discrimination and harassment,
- Providing employees and management with confidential counseling regarding job related problems,
- Researching and recommending accommodations for employees with disabilities, and
- Providing guidance to management on policy and procedure interpretation and implementation.

At The Hartford, we believe it is important to treat all employees fairly. Fair treatment can occur only in a work environment that is free of discrimination and harassment. We take this position, not just because the law requires it, but also because we believe it makes good business sense. The Hartford is committed to investigating and addressing allegations of discrimination and harassment.

[Return to Top](#)

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### Confidentiality

The EOD Department maintains a level of strict confidentiality to the extent permitted by law. The EOD Department will seek the employee's permission prior to taking action whenever possible.

[Return to Top](#)

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## 1 Guiding Principles

### 1.3 Equal Employment Opportunity 8/1/99

[Policy](#)  
[Rationale](#)  
[Scope](#)  
[Applying the Policy](#)  
[Links](#)

#### Policy

Employment decisions at The Hartford will be based on merit, qualifications, and abilities. The Hartford does not discriminate in employment opportunities or practices on the basis of race, color, sex, religion, age, national origin, disability, veteran status, sexual orientation, marital status, ancestry or citizenship status, pregnancy status or any other characteristic protected by law.

[Return to top](#)

#### Rationale

In compliance with all state and federal anti-discrimination laws, The Hartford is committed to providing equal employment and advancement opportunities to all qualified individuals.

[Return to top](#)

#### Scope

This policy:

- is applicable in all U.S. locations. Non-U.S. units shall also apply the intent and provisions of this policy unless local law requires otherwise.
- governs all aspects of employment, including: selection; job assignment; compensation; discipline; opportunities for advancement (including promotions and transfers); access to benefits; training and work-related social/recreational programs; and termination.

[Return to top](#)

#### Applying the Policy

The Equal Opportunity Development (EOD) Director is responsible for ensuring that policies and programs adopted by The Hartford are consistent with the intent of this policy.

All managers and supervisors of The Hartford are responsible for complying with this policy.

[Return to top](#)

## 1 Guiding Principles

### 1.4.1 Reporting Informal and Formal Charges of Discrimination 8/1/99

Policy  
Rationale  
Scope  
Applying the Policy  
Links

#### Policy

Management in all departments and/or locations is required to report all discrimination-related situations as follows:

Situation	Procedure
Informal complaints from employees	Call your HR representative <b>OR</b> <b>Equal Opportunity Development</b> at 860-547-3383, Hartford Plaza.
Formal complaints from federal, state, municipal, or other recognized compliance agencies	Fax the Notice of Discrimination or formal complaint to <b>EOD</b> at 860-547-2671.
Suits involving employment discrimination allegations	<ul style="list-style-type: none"><li>• Call the <b>Law Department</b>, Hartford Plaza at 860-547-4573 or 860-547-8787 <b>OR</b>, in the Life Company, call 860-843-5202.</li><li>• Fax legal documents or counsel letters to the <b>Law Department</b> (860-547-6959) or send via overnight mail (Hartford Plaza, HO-1-09 <b>OR</b>, in the Life Company, send fax to 860-843-8665.</li></ul>

No member of management or Human Resources may investigate a complaint of discrimination made against himself or herself or against a direct report. Such claims must be investigated by Human Resources, EOD, or the Law Department.

[Return to top](#)

## The Ombudsman

<p>The Ombudsman's Role Confidentiality Reporting</p>
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### The Ombudsman's Role

The ombudsman's office provides a safe place where, in confidence, employees can report:

- fraud
- suspected criminal activity
- improper treatment, and
- violations of the Corporate Code of Conduct.

The ombudsman is a "neutral" - neither an advocate of employees or the company. The ombudsman's function is to provide confidential and informal assistance to employees and managers. When making recommendations, the ombudsman has the responsibility to suggest actions or policies that will be equitable to all parties.

[Return to Top](#)

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### Confidentiality

The ombudsman maintains strict confidentiality concerning matters brought to his/her attention unless the employee gives permission to do otherwise. The only exceptions, at the sole discretion of the ombudsman, are where there appears to be imminent threat of serious harm. There is no caller ID on the Ombudsman lines and phone records are handled separately from the Ombudsman's office.

Some issues can only be resolved by giving up confidentiality. However, the ombudsman will not:

- use names without permission or otherwise risk revealing the identity of the person; or
- take any action to solve a problem, even if the ombudsman thinks the identity of the person will not be compromised without permission.

[Return to Top](#)

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